

June 20, 2018

VIA U.S. MAIL

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

Re: Umemoto v. ABB, et al. – Civil No. 17-1-1285-08 (10th Div)
Hawaii State Asbestos Case

Dear FOIA Coordinator:

Pursuant to the **Hawaii Open Records Law § 91-1 et seq.**, and the Freedom of Information Act (FOIA), **5 U.S.C. § 552**, this is an open records request for a certified copy of all records (including recordings and images) in your possession regarding the below- referenced locations for the time period 1951 - 2000, for the following sites:

1. **Shell Oil**
789 North Nimitz Highway
Honolulu, Hi 96817
a/k/a Berth 31

2. **Chevron Oil / Chevron U.S.A. Inc.**
777 North Nimitz Highway
Honolulu, Hi 96817
a/k/a Berth 25

- or

- 91-480 Malakole Street
Kapolei, Hawaii 96707

3. **Union Oil**
411 Pacific Street
Honolulu, Hi 96817
a/k/a Berth 24

4. **Par Hawaii Refining LLC / Hawaii Independent Energy LLC**
91-325 Komohana Street
Kapolei, HI 96707
5. **Campbell Industrial Park**
91-196 Hanua Street
Kapolei, HI 96707
6. **Kaiser Cement**
Waianae, Oahu, Hawaii
- or
- Lualualei Naval Road, Nanakuli, Hawaii
7. **Maui Concrete / Maui Concrete and Aggregate Division**
Puunene Quarry, Mokulele Hwy.
Puunene, HI 96753
- or
- Keana Point Quarry
Farrington Highway
8. **Union Fuel Storage Site**
Honolulu, Hawaii
9. **Queen's Hospital**
1301 Punchbowl Street
Honolulu, HI 96813
10. **Kapiolani Hospital**
1319 Punahou Street
Honolulu, HI 96826

For each of the above-identified locations, please provide the following information:

1. All records, reports, notes, memoranda, photographs, correspondence, drawings and any other materials regarding incidents, inventories, correspondence, surveys,

abatement, release, handling, storage, materials, handling, etc. involving asbestos or asbestos-containing products or those suspected of being so.

2. All documents received or generated relating to dust or air monitoring, safety practices and protocol and raining procedures regarding asbestos and/or nuisance dusts in general, including but not limited to al records, reports, notes, memoranda, photographs, correspondence, drawings, complaints, inspections, investigations, inquiries and any other materials.
3. All documents received or generated by you relating to compliance with Occupational Safety and Health Administration regulations regarding asbestos and/or nuisance dusts including but not limited to all records, reports, notes, memoranda, photographs, correspondence, drawings, complaints, inspections, investigations, inquiries and any other materials.
4. All documents received or generated by you relating to health or safety inspections by local, state or federal regulatory agencies regarding asbestos and/or nuisance dusts in general, including but not limited to all records, reports, notes, memoranda, photographs, surveys, correspondence, drawings, complaints, inspections, investigations, inquiries and any other responsive materials.
5. All documents relating to asbestos abatement, including but not limited to air and dust monitoring records; records of installation and construction, usage, maintenance, repair and removal; material specifications; design specifications; order cards; bills of materials; lagging drawings; assembly drawings; engineering drawings, blueprints and dates when such abatement took place.
6. All documents relating to asbestos waste disposal and transportation, including but not limited to waste disposal manifests, permit records, reporting documentation, certifications and training documentation.
7. All documents relating to licenses, permitted and certifications granted or revoked by the United States Environmental Protection Agency regarding asbestos or nuisance dusts in general at any of the above- referenced locations.

The Hawaii Open Records Law requires a response time within ten business days. If access to the records I am requesting will take longer than ten days, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. If this request is in fact denied, the undersigned reserves all available legal remedies.

Kindly provide the requested records to me electronically at dsugihara@fbslawyers.com. If the requested records cannot be transmitted electronically, contact me at (808) 451-3180 to discuss alternative options for production. To the extent applicable, please advise of the costs of reproducing the documents. I am willing to pay reasonable costs for such copies.

Should you have any questions, please do not hesitate to call. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dawn T. Sugihara", with a stylized flourish at the end.

Dawn T. Sugihara